

E-filed 6/28/06

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9 Attorneys for Defendant
JERRY R. JOLLY, Director
10 California Department of Alcoholic Beverage Control

15 KNIGHTSBRIDGE WINE SHOPPE, LTD., et al.
16 Plaintiffs,
17 v.
18 JERRY R. JOLLY, in his capacity as Director
19 of the California Department of Alcoholic Bevera-
Control,
20 Defendant.

Case No.: 5:06-CV-02890-JF

**STIPULATION AND
[PROPOSED ORDER]
RE: CHANGE OF INDIVIDUAL
PLAINTIFF, EXTENSION OF
TIME TO RESPOND TO FIRST
AMENDED COMPLAINT**

22 By and through their respective attorneys of record, plaintiffs Knightsbridge Wine Shoppe,
23 Ltd., et al. and defendant Jerry R. Jolly, in his capacity as Director of the Department of Alcoholic
24 Beverage Control, hereby stipulate and agree as follows:

25 1. Pursuant to leave granted orally by the Court at the status conference held on June 9, 2006,
26 Steven M. Cohen (Cohen) is hereby added and Stephen Ravel (Ravel) is hereby removed as a
27 plaintiff in this action, effective as of the date of filing of the First Amended Complaint, and all
28 allegations made in the First Amended Complaint on behalf of Ravel, either singly or collectively

1 with the other plaintiffs, shall be deemed as made by Cohen.

2 2. The time within which defendant shall respond to the First Amended Complaint as thus
3 modified shall be extended by an additional two weeks, from the current due date of June 26, 2006
4 to July 10, 2006, or by such other and lesser time, if any, as the court may deem appropriate;

5 3. The parties shall have until July 14, 2006 to carry out the requirements of Federal Rules of
6 Civil Procedure 26(a)(1) and 26(f).

7 GOOD CAUSE exists, as follows, for approval of the extensions of time sought pursuant to this
8 stipulation:

9 1. As they informed the Court at the time, when the parties appeared at the status conference
10 held on June 9, 2006, they expected a decision to issue shortly in a related case then pending before
11 the District Court for the Central District of California that would provide a basis for resolution of
12 this case pursuant to stipulation.

13 2. Due to the recent, unexpected dismissal of this related action, the parties have resumed
14 discussion of how this case might be promptly and efficiently resolved.

15 3. The requested extensions will allow the parties to continue these discussions without
16 prejudicing their respective positions in the litigation.

17 Dated: June 26, 2006

KIRKLAND & ELLIS LLP

19 By: /s/ James Shannon

20 Kenneth W. Starr
21 James F. Basile
22 James Shannon
23 Tracy K. Genesen
24 Christopher W. Keegan
25 Ryan M. Christian
26 KIRKLAND & ELLIS LLP

27 Attorneys for Plaintiffs

1 Dated: June 26, 2006
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6 /s/ Marjorie E. Cox
7 MARJORIE E. COX
Deputy Attorney General

8 Attorneys for Defendant

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11 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

12
13 DATED: June 27, 2006

14 
15 HONORABLE JEREMY FOGEL
District Court Judge

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